

**UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MASSACHUSETTS**

THOMAS TURNER, an individual, on behalf
of himself and others similarly situated,

Plaintiff,

v.

LIBERTY MUTUAL RETIREMENT
BENEFIT PLAN; LIBERTY MUTUAL
MEDICAL PLAN; LIBERTY MUTUAL
RETIREMENT BENEFIT PLAN
RETIREMENT BOARD; LIBERTY
MUTUAL GROUP INC., a Massachusetts
company; LIBERTY MUTUAL INSURANCE
COMPANY, a Massachusetts company; and
DOES 1–50, Inclusive,

Defendants.

Civil Action No.:1:20-cv-11530-FDS

JOINT PROPOSAL FOR REMAINING DISCOVERY ISSUES

During the status conference held on March 28, 2024, the Court directed the parties to confer on a framework regarding the resolution of any remaining discovery issues. (ECF No. 155.) On April 4, Plaintiff provided Liberty Mutual with a set of issues and specific discovery requests as to which disagreements remain. The parties conferred, and respectfully propose the following schedule to present any remaining discovery issues for the Court’s resolution:

- April 12, 2024: Liberty Mutual to provide its response to Plaintiff regarding discovery issues identified in Plaintiff’s April 4 email.
- May 1, 2024: Deadline for Plaintiff to file a motion to compel (directed to Chief Judge Saylor in the first instance) regarding unresolved discovery disputes, if any.
- May 15, 2024: Deadline for Liberty Mutual to file its opposition to Plaintiff’s motion to compel.
- May 22, 2024: Deadline for Plaintiff to file his reply to Liberty Mutual’s opposition to Plaintiff’s motion to compel.

The parties are available should the Court have any questions.

Respectfully submitted,

Dated: April 5, 2024

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CERTIFICATE OF SERVICE

I certify that this document, filed through the Court's ECF system, will be sent electronically to the registered participants in this matter as identified on the Notice of Electronic Filing.

Dated: April 5, 2024

/s/ Annabel Rodriguez

Annabel Rodriguez (BBO # 696001)